

## **IN THE DRAWINGS**

FIG. 2C is amended to add the adjacent light emitting diode 64.

FIG. 3A is amended to modify lines to illustrate the grouping of the first, second, and third light emitting diode (61, 62, 63) and the adjacent light emitting diode.

FIG. 3B is amended to modify lines to illustrate the grouping of the first, second, and third light emitting diode (61, 62, 63) and adjacent light emitting diodes in a cell structure.

## **Attachments**

Annotated sheets

Replacement Sheets

## **REMARKS**

### **Specification and Drawings**

The specification and drawings have been amended in response to the objections noted in the Office Action. The objections, having been properly addressed, should now be withdrawn.

### **Response to Rejections Under 35 U.S.C. §112**

The Office Action rejected claims 1, 2, 7, 9-12, 17, 19, and 20 under 35 U.S.C. § 112, first paragraph. In response, independent claims 1 and 11 are amended to further define the basic cell structure. Figs. 2C to 3B are amended, wherein “each basic cell structure comprising three unique colors of first, second and third light emitting diodes, and an adjacent light emitting diode” is correctly illustrated.

Page 3, lines 10-14 and 17-20 of the specification are amended for consistency with amended claim 1. Thus, this portion of the specification now reads: “an object of the invention is to provide a backlight unit comprises red, green, and blue (RGB) light emitting diodes (LEDs) on a planar surface in a specific arrangement such that the backlight unit provides light as bright and white as possible” and “Each basic cell structure comprises three unique colors of first, second, and third light emitting diodes, arranged in a first equilateral triangle” is described in the specification. According to Fig. 2C, each basic cell structure includes three unique colors of first, second, and third light emitting diodes, and an adjacent light emitting diode.

## **Response to Rejections Under 35 U.S.C. §102**

In short, the amendments to independent claims 1 and 11 render the rejections moot, and patently define these claims over the cited art.

As amended, these claims recite:

1. A backlight unit for a liquid crystal display, comprising:  
a light source comprising:  
a plurality of basic cell structures, wherein each basic cell structure,  
comprising:  
three unique colors of first, second and third light emitting diodes;  
and  
an adjacent light emitting diode;  
**wherein the first, second and third light emitting diode and the adjacent light emitting diode are arranged in a quadrilateral;**  
**wherein the adjacent light emitting diode and one of the first, second and third light emitting diodes are green.**

11. A liquid crystal display, comprising:  
a backlight unit; and  
a light source comprising:  
a plurality of basic cell structures, wherein each basic cell structure,  
comprising:  
three unique colors of first, second, and third light emitting diodes;  
and  
an adjacent light emitting diode;  
**wherein the first, second and third light emitting diode and the adjacent light emitting diode are arranged in a quadrilateral;**  
**wherein the adjacent light emitting diode and one of the first, second, and third light emitting diodes are green.**

(Emphasis added.) Independent claims 1 and 11 patently define over the cited art for at least the reason that the cited art fails to disclose the features emphasized above.

In Lin et al, the LEDs can form a plurality of quadrilaterals. However, **not each quadrilateral comprises two green LEDs.** This limitation is expressly recited in amended claims 1 and 11. Thus, claims 1 and 11 patently define over the cited art.

In addition, claim 11 defines that a liquid crystal display comprising a backlight unit and a light source. The light source comprises a plurality of basic cell structures. **Each** basic cell structure comprises three unique colors of first, second and third light emitting diodes, and an adjacent light emitting diode are arranged in a **quadrilateral**. **The adjacent light emitting diode and one of the first, second and third light emitting diodes are green.** However, Fig. 5H in Lin et al shows three colors LEDs (red, green and blue) arranged in a triangle. In Lin et al, the LEDs can form a plurality of quadrilaterals. However, **not each quadrilateral comprises two green LEDs.** Thus, claim 11 is not anticipated by Lin et al.

#### **Response to Rejections Under 35 U.S.C. §103**

As all remaining claims depend from either claim 1 or 11, all claims patently define over the cited art for at least the reasons set forth above.

#### **CONCLUSION**

For at least the reasons described above, independent claims 1 and 11 are allowable over the cited references. Insofar as the independent claims define over the cited art, the remaining (dependent) claims patently define over the cited art as well.

Should Examiner feel that further discussion of the application and the Amendment is conducive to prosecution and allowance thereof, please do not hesitate to contact the undersigned at the address and telephone listed below.

A credit card authorization is provided herewith to cover the fee associated with the accompanying RCE application. No addition fee is believed to be due in connection with

this submission. If, however, any additional fee is believed to be due, you are hereby authorized to charge any such fee to deposit account No. 20-0778.

Respectfully submitted,

By:

  
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## Annotated Sheet

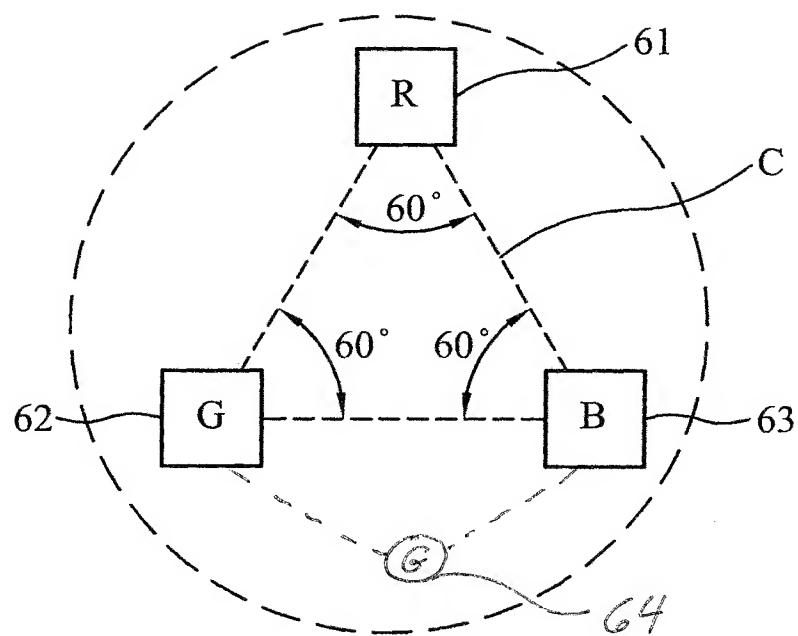
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FIG. 2C

Annotated Sheet

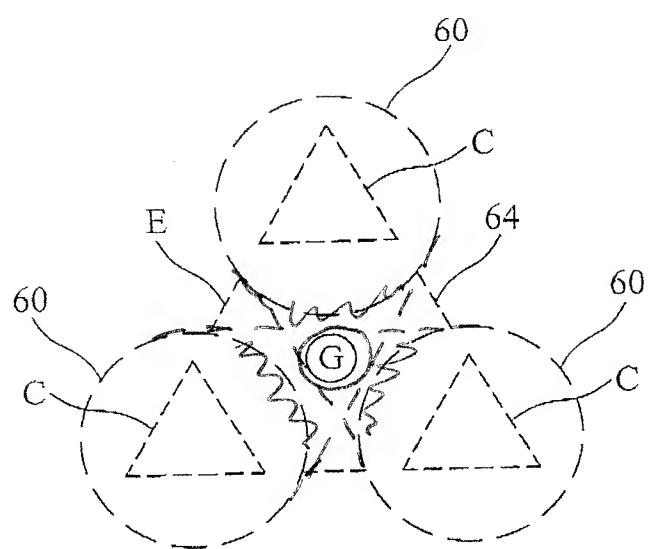


FIG. 3A

Annotated Sheet

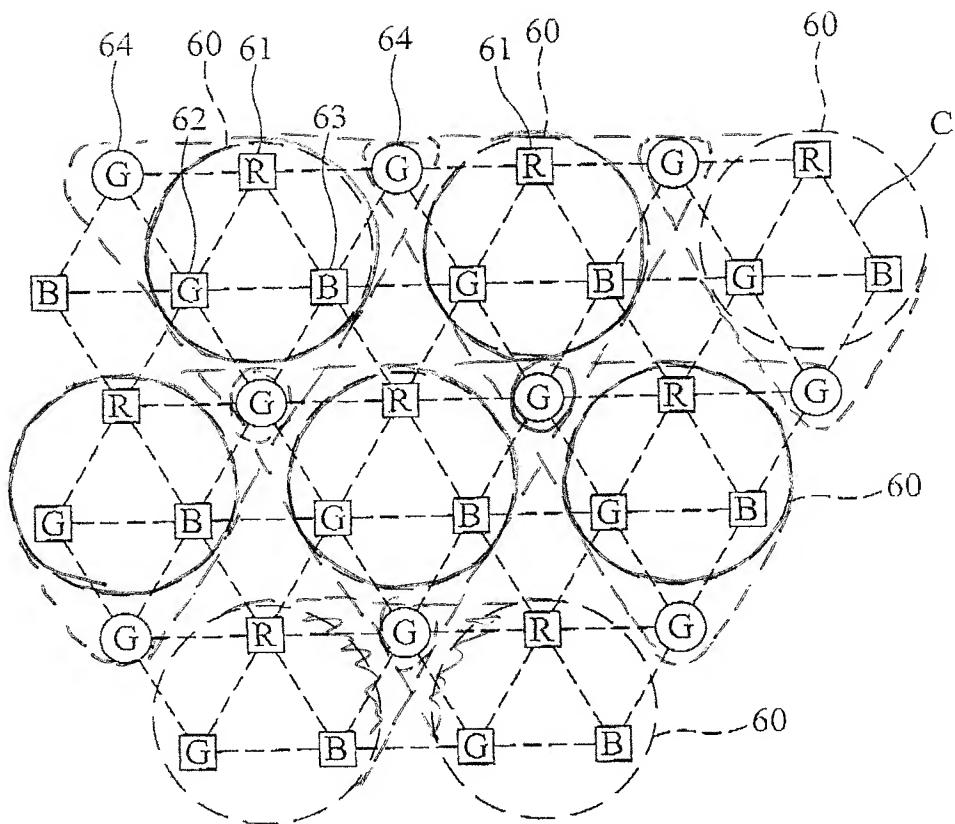


FIG. 3B

LOCATION:

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